

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

JESSICA HODGES, et al.)
Plaintiffs,) Case Number: 4:22-cv-00067-WTM-CLR
vs.)
CHATHAM COUNTY, GEORGIA, et al.)
Defendants.)

EXHIBIT 10

CorrectHealth Privilege Log

Nov. 16, 2022

#	Document Description	Document Type	Author	Recipient	Date	Privilege Claimed
1	Communication from K. Forchette to Company's General Counsel re: J. Harned's statement about death of Lee Creely, for review and analysis by Company legal department	Email Correspondence	Karen Forchette	Stacy Scott, Esq. (Chief Legal Officer/General Counsel for CorrectHealth)	9/8/2020	Attorney-Client Privilege
2	Communication from K. Forchette to Company's General Counsel re: Facility Mortality Review	Email Correspondence	Karen Forchette	Stacy Scott, Esq. (Chief Legal Officer/General Counsel for CorrectHealth)	9/8/2020	Attorney-Client Privilege
3	Communication from K. Forchette to Company's General Counsel re: information concerning Lee Creely's death and J. Harned's handwritten statement	Email Correspondence	Karen Forchette	Stacy Scott, Esq. (Chief Legal Officer/General Counsel for CorrectHealth)	9/8/2020	Attorney-Client Privilege
4	Statement from J. Harned about death of Lee Creely, prepared for review and analysis by Company legal department	Handwritten Statement	Jackie L. Harned	Company Legal Department	9/8/2020	Attorney-Client Privilege
5	Facility Mortality Review Form prepared in anticipation of litigation by Company healthcare providers at direction of Company's General Counsel	Handwritten Notes on Attorney-Drafted Form	Artyom Vlasenko, M.D. and Karen Forchette, RN at the direction of Stacy Scott, Esq.	Company Legal Department	9/8/2020	Attorney-Client Privilege; Attorney Work Product
6	Statement from J. Harned about death of Lee Creely, prepared for review and analysis by Company legal department	Typed Statement	Jackie L. Harned	Company Legal Department	9/8/2020	Attorney-Client Privilege
7	Communication from CorrectHealth Medical Provider to General Counsel re: death of Lee Creely, sent to obtain for legal advice from Company legal department	Email Correspondence	Anuj Goel, M.D.	Stacy Scott, Esq. (Chief Legal Officer/General Counsel for CorrectHealth)	9/10/2020	Attorney-Client Privilege

8	Communication from CorrectHealth General Counsel to Medical Provider re: death of Lee Creely and statement concerning the same	Email Correspondence	Stacy Scott, Esq. (Chief Legal Officer/General Counsel for CorrectHealth)	Anuj Goel, M.D.	9/10/2020	Attorney-Client Privilege; Attorney Work Product
9	Communication from CorrectHealth Medical Provider to General Counsel re: death of Lee Creely and statement concerning same, sent to obtain legal advice from Company legal department	Email Correspondence	Anuj Goel, M.D.	Stacy Scott, Esq. (Chief Legal Officer/General Counsel for CorrectHealth)	9/10/2020	Attorney-Client Privilege
10	Communication from K. Forchette to Company's General Counsel re: information concerning coroner's subpoena for medical records	Email Correspondence	Karen Forchette	Stacy Scott, Esq. (Chief Legal Officer/General Counsel for CorrectHealth)	9/10/2020	Attorney-Client Privilege
11	Communication from CorrectHealth Medical Provider to General Counsel re: statement concerning death of Lee Creely, prepared for review and analysis by Company legal department	Email Correspondence	Anuj Goel, M.D.	Company Legal Department	9/15/2020	Attorney-Client Privilege
12	Statement from CorrectHealth Medical Provider re: death of Lee Creely, prepared at request of General Counsel	Typed Statement	Anuj Goel, M.D.	Stacy Scott, Esq. (Chief Legal Officer/General Counsel for CorrectHealth)	9/15/2020	Attorney-Client Privilege
13	Communication from Company's General Counsel to K. Forchette re: Lee Creely's medical records	Email Correspondence	Stacy Scott, Esq. (Chief Legal Officer/General Counsel for CorrectHealth)	Karen Forchette	9/17/2020	Attorney-Client Privilege
14	Communication from K. Forchette to Company's General Counsel re: Lee Creely's medical records	Email Correspondence	Karen Forchette	Stacy Scott, Esq. (Chief Legal Officer/General Counsel for CorrectHealth)	9/17/2020	Attorney-Client Privilege

15	Quality Assurance/Morbidity & Mortality Review prepared in anticipation of litigation by Company's General Counsel, for use in internal investigation	Memorandum/Notes	Stacy Scott, Esq. (Chief Legal Officer/General Counsel for CorrectHealth)	N/A (internal documentation)	9/17/2020	Attorney-Client Privilege; Attorney Work Product
16	Communication from K. Forchette to Company's General Counsel re: J. Harned's supplemental statement	Email Correspondence	Karen Forchette	Stacy Scott, Esq. (Chief Legal Officer/General Counsel for CorrectHealth)	9/18/2020	Attorney-Client Privilege
17	Statement from J. Harned about death of Lee Creely, prepared for review and analysis by Company legal department	Handwritten Statement	Jackie L. Harned	Company Legal Department	9/18/2020	Attorney-Client Privilege
18	Communication from K. Forchette to Company's General Counsel re: J. Harned's typed statement	Email Correspondence	Karen Forchette	Stacy Scott, Esq. (Chief Legal Officer/General Counsel for CorrectHealth)	9/23/2020	Attorney-Client Privilege